

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JONG HAM, an individual,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A., a
Delaware corporation,

Defendant.

Case No. 3:23-cv-05698-BJR

**STIPULATED MOTION TO EXTEND
TRIAL AND RELATED DEADLINES**

Plaintiff, Jong Ham, and Defendant, JPMorgan Chase Bank, N.A. (together the “Parties”), stipulate and jointly request that the Court continue the trial and related dates scheduled on the Order Setting Trial Dates and Related Dates, entered July 19, 2024 (Dkt. No. 37), for the reasons set forth below.

Since the last continuance in this matter on July 19, 2024, the Parties have continued to conduct discovery and believe mediation of the matter may be fruitful. However, due to scheduling, including availability of the mediator, the Parties will not be able to mediate until November 18, 2024. Mediation has now been scheduled and confirmed for that date before Judge Dean Lum with JAMS.

Prior to mediation, while the Parties continue to conduct discovery, they believe that the

STIPULATED MOTION TO EXTEND TRIAL
AND RELATED DEADLINES- 1
(Case No. 3:23-cv-05698-BJR)

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economies of the Parties and Court would be best served by extending the existing deadlines. In particular, the Parties believe that judicial economy favors extending fact and expert discovery, if any, until after mediation. Doing so would not only conserve the Parties' resources, but also potentially avoid unnecessarily burdening the Court with motions practice and disputes that may prove ultimately unnecessary.

The Parties further believe that a continuance is warranted that would allow adequate time to complete discovery, including expert discovery, dispositive motions, and trial preparation in the event the November 18th mediation is unsuccessful.

The Parties certify that they have conferred and stipulate and agree that the trial and related dates should be continued as follows, and respectfully ask the Court to enter an order setting the following deadlines:

EVENT	CURRENT DEADLINE (Dkt. 37)	PROPOSED DEADLINE
TRIAL DATE	May 19, 2025	August 18, 2025
Deadline for Joining Additional Parties	December 13, 2024	February 3, 2025
Fact Discovery Cutoff	November 20, 2024	March 3, 2025
Deadline for filing amended pleadings	December 26, 2024	March 14, 2025
Deadline to Disclose Expert Witnesses	October 25, 2024 (<i>by agreement</i>)	March 7, 2025
Expert Reports Due (FRCP 26(a)(2))	December 20, 2024	March 21, 2025
Expert Rebuttal Reports Due	N/A	April 18, 2025
Expert Discovery Cutoff	N/A	May 19, 2025
All dispositive motions must be filed by	January 24, 2025	June 2, 2025
All motions <i>in limine</i> must be filed by	April 10, 2025	July 14, 2025
Pretrial Statement Due	February 18, 2025	July 25, 2025
Pretrial Conference	March 3, 2025	August 8, 2025
Length of Trial	2-7 Days	2-7 Days

For the reasons stated above, the Parties respectfully request the Court enter the [Proposed] Order Continuing Trial and Related Dates submitted herewith.

IT IS SO STIPULATED.

DATED this 8th day of October 2024.

CAIRNCROSS & HEMPELMANN, P.S.

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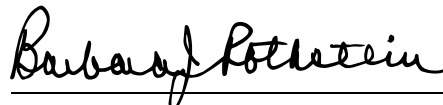
ORDER

The Stipulated Motion to Extend Trial and Related Deadlines is GRANTED. Trial in this matter is continued to August 18, 2025, and all pretrial dates shall be continued as set forth below:

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The Court cautions that it is unlikely to grant any further extensions to case management dates.

DATED this 8th day of October, 2024.



Barbara Jacobs Rothstein
U.S. District Court Judge

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